

EXHIBIT C-1

EASTMAN & EASTMAN

ATTORNEYS

39 WEST 54TH STREET
NEW YORK, N.Y. 10019-5491

212 246-5757

December 16, 2016

Mr. Martin Bandier
Sony/ATV Tunes LLC
25 Madison Ave, 24th Floor
New York, NY 10010

Re: Paul McCartney's U.S. Copyright Termination Notices

Dear Marty,

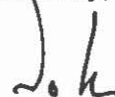
From your two recent conversations with Lee, I gather Sony/ATV disputes our client Paul McCartney's rights of termination under 17 U.S.C. § 304(c) for songs he co-wrote with John Lennon and other members of the Beatles and on his own that are now published by Sony/ATV. What is the basis for your position?

If you are not disputing Paul McCartney's rights of termination, please confirm that the termination notices served on Sony/ATV are effective.

I have enclosed with this letter a schedule and copies of the relevant notices we have served and recorded in the Copyright Office.

If necessary, our client will file an action for a declaratory judgment in the United States District Court for the Southern District of New York to confirm his rights, and you should thus consider this letter notice before action.

Sincerely,



John L. Eastman

Delivered By Hand

EXHIBIT C-2

MARTIN N. BANDIER
CHAIRMAN & CEO

212 . 833 . 7500 OFFICE
212 . 833 . 7501 FAX

25 MADISON AVENUE, 24TH FLOOR
NEW YORK . NY . 10010

December 19, 2016

John L. Eastman
Eastman & Eastman Attorneys
39 West 54th Street
New York, NY 10015

Dear John,

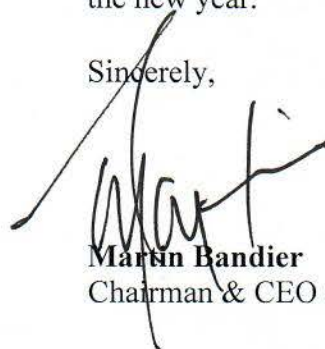
We are in receipt of your December 16, 2016 regarding Paul McCartney's U.S. Copyright termination notices. First I'd like to wish you and your family all the best for the holiday season.

Turning to your letter, I must say that I'm surprised that a collegial conversation I had with Lee a few weeks ago at a Billy Joel concert has apparently been misunderstood and caused you to threaten to bring a lawsuit against Sony/ATV.

So hopefully, I can clear up any possible misunderstanding. Your letter asks whether Sony/ATV is disputing Paul McCartney's right of termination under Section 304 (c) of the US Copyright Act. It does not. The previously served notices of termination enclosed with your December 16th letter constitute an effective exercise under Section 304(c) and will become effective on the dates stated in the notices.

I look forward to rescheduling lunch with you and Lee in the new year.

Sincerely,



Martin Bandier
Chairman & CEO of Sony/ATV

EXHIBIT C-3

EASTMAN & EASTMAN

ATTORNEYS

39 WEST 54TH STREET
NEW YORK, N.Y. 10019-5491

212 245-5757

December 21, 2016

Mr. Martin Bandier
Sony/ATV Tunes LLC
25 Madison Ave, 24th Floor
New York, NY 10010

Re: Paul McCartney's U.S. Copyright Termination Notices

Dear Marty,

Thank you for your reply.

We appreciate your willingness to resolve any possible misunderstandings. As we begin to think about our plans for these works following termination, you will understand our desire that no possibility of litigation cloud our title.

Because you raised the Duran Duran case with Lee in a way we interpreted as a threat, we request that you clarify that Sony/ATV not only regards the termination notices to be effective under Section 304(c) of the Copyright Act, but also that the termination notices give rise to no valid claim, in contract or otherwise.

Please let me know your position promptly.

Sincerely,

A handwritten signature in black ink, appearing to be 'JL' with a stylized flourish at the end.

John L. Eastman

EXHIBIT C-4

From: [Bandier, Martin](#)
To: [Elizabeth Fonacier](#); [John Eastman](#); [Lee Eastman](#)
Subject: Re:
Date: Wednesday, December 21, 2016 12:44:46 PM

Hi John, I'm on holiday and I promise I will get back to you as soon as I return in early january, best for the holidays, marty

From: Elizabeth Fonacier
Sent: Wednesday, December 21, 2016 11:53 AM
To: Bandier, Martin
Subject:

Marty,

Please see the attached.

-John

Elizabeth Fonacier
Eastman & Eastman
39 West 54th Street
New York, NY 10019

(P) 212-246-5757
(F) 212-9778408

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EXHIBIT C-5

From: [Bandier, Martin](#)
To: [John Eastman](#)
Cc: [Lee Eastman](#)
Subject: Paul McCartney U.S. Copyright Termination Notices
Date: Thursday, January 05, 2017 11:45:02 AM
Attachments: [image001.png](#)

Dear John, happy new year. I hope you and your family had a restful holiday.

Now that we're back in the office I wanted to respond to your December 21st letter. First, let me say again that it is unfortunate that the conversation I had with Lee was taken as a threat. That certainly was not my intention. However, since you have asked for certain assurances that amount to legal conclusions I have turned this matter over to our outside counsel Don Zakarin. You will have a substantive response from him early next week. I am hopeful that after you receive that we can engage in productive discussions about your plans for the compositions post-termination.

Best,

Martin Bandier
Chairman / CEO

Sony/ATV Music Publishing | 25 Madison Avenue, 24th Floor | New York, NY 10010
212.833.7500 (office) | 212.833.7501 (fax)
Martin.Bandier@sonyatv.com | www.sonyatv.com



EXHIBIT C-6

From: [Zakarin, Donald S.](#)
To: [John Eastman](#)
Cc: [Lee Eastman](#); [Bandier, Martin](#)
Subject: Paul McCartney U.S. Copyright Termination Notices
Date: Monday, January 09, 2017 3:10:48 PM

John:

Marty has asked that I respond to your note of December 21, 2016.

First, I want to make clear that SATV has no wish to engage in litigation with Paul and it has already confirmed to you that it fully understands his exercise of the right of termination provided him with respect to the US copyright under Section 304(c) of the Copyright Act. Consistent with Section 304, SATV will retain all of its derivative works rights in the US as well as retaining its foreign rights in Paul's share of the compositions post-termination. As I believe you know, SATV has already made arrangements with respect to John Lennon's share of the compositions and will retain its worldwide rights in his share of the compositions for the life of copyright.

Given SATV's continuing role and interest in the compositions, both foreign and in the US, I know that it is Marty's hope that SATV will be able to reach a going forward agreement with Paul that will be mutually beneficial. That is and will remain SATV's main focus and Marty looks forward, at the appropriate time, to discussing with you and with Lee your plans for Paul's interest in the compositions post-termination and how SATV can work with Paul in that regard. With respect to the Duran Duran case, it has yet to conclude – in particular, the hearing before the trial Judge to determine the impact of his Judgment and the post-trial relief to be granted has yet to take place as well as any potential appeals. Accordingly, with respect to your request for confirmation regarding the relinquishment of any possible rights of SATV, it seems to SATV to be premature to discuss theoretical future events which I know that SATV hopes will never arise and therefore will not warrant or necessitate any discussion.

Best regards.

Donald S. Zakarin
Pryor Cashman, LLP
7 Times Square
New York, NY 10036
212-326-0108 (P)
212-798-6306 (F)
dzakarin@pryorcashman.com

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